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April 15, 2021

***Via ECF***

Honorable Kenneth Karas  
United States District Court  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: *Holland v. Matos, et. al*, 18 Civ. 6697 (KMK) (JCM)

Dear Judge Karas:

We represent Plaintiff Greg Holland and write, at the Court's request, regarding the Request to Proceed in Forma Pauperis filed by Thomas Matos (Dkt. No. 87). Plaintiff offers no view on the request. Notwithstanding, Plaintiff expresses his concerns about the accuracy of the financial information provided by Defendant Thomas Matos in his February 16, 2021 submission requesting the appointment of pro bono counsel. (Dkt. No. 84.).

Through discovery in this matter, Plaintiff has learned that Thomas Matos, Nanci Matos and the corporate Defendant, Bestlife Gifts, LLC, maintained at least fifteen bank accounts: four with Bank of America, four with TD Bank, two with Walden Savings Bank, three with Hudson Heritage Federal Credit Union, and three with PayPal. These accounts received approximately \$1,325,000 during a two-year period. A substantial amount of those deposits was withdrawn in cash.

Defendants have only disclosed two accounts from one of those five financial institutions. It is unclear if additional accounts exist, what their balances are, or if Defendants hold cash that has not been deposited in a bank.

Respectfully submitted,

**ScottHulse PC**



Luis F. Calvo  
For the Firm

cc: All Defendants (via ECF)